

# **EXHIBIT 7**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

COMMONWEALTH OF  
MASSACHUSETTS, et al.,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH,  
et al.,

Defendants.

Civil Action No. \_\_\_\_\_

**Declaration of Ken A. Dill**

I, Ken A. Dill, hereby declare:

1. I am a SUNY Distinguished Professor of Physics and Chemistry, Affiliated Distinguished Professor in Applied Math, the Louis and Beatrice Laufer Endowed Chair of Physical and Quantitative Biology, and founding and current Director of the Laufer Center for Physical and Quantitative Biology at Stony Brook University (“Laufer Center”). I am also an elected member of the US National Academy of Sciences. I received my Ph.D. in Biology from the University of California San Diego in 1978.
2. I study the physics of protein folding, the statistical mechanics of water, principles of nonequilibrium statistical thermodynamics in small systems, and the mechanisms and evolution of cells. I have authored over 360 academic publications, including co-authoring two textbooks, *Molecular Driving Forces*, a textbook in physical chemistry and statistical mechanics with Sarina Bromberg, and *Protein Actions: Principles and Modeling*, an introduction to the biological, chemical, and physical properties of proteins with Ivet Bahar and RL Jernigan.

3. I have personal knowledge of the matters set forth below.
4. I am providing this declaration to explain how the National Institutes of Health (“NIH”) Notice Number NOT-OD-25-068, *Supplemental Guidance to the 2024 NIH Grants Policy Statement: Indirect Cost Rates*, which purports to immediately reduce indirect costs payments to 15%, will cost thousands of Americans their lives.
5. Stony Brook University (“SBU”) is a flagship research university in the State University of New York (“SUNY”) system. Because SBU performs a very high level of research activity, it is one of a select few universities to achieve a R1 rating from the Carnegie Classification of Institutions of Higher Education, the highest rating possible.
6. The research we perform at the Laufer Center provides the building blocks for untangling the complex mystery of neurodegenerative diseases like Alzheimer’s Disease, Parkinson’s Disease, and Huntington’s Disease.
7. For example, I received a grant of approximately \$6 million from the National Institutes of Health to research the underlying mechanisms of neurodegenerative diseases. My research involves studying the protein structures that underly these diseases, including how proteins group together to form amyloid aggregates. Understanding amyloid aggregates is an essential step towards treatments, and ultimately a cure, for neurodegenerative diseases.
8. These neurodegenerative diseases have destroyed millions of American lives, and it is absolutely critical that we continue to make steady progress towards curing them.
9. This kind of painstaking research that, historically, is primarily done by institutions of higher education. The private sector, and in particular, pharmaceutical companies, rarely invest in this type of lifesaving research because it requires decades of steady work and is therefore cost prohibitive.

10. This is particularly true for neurodegenerative diseases, in large part because the proteins involved in such diseases behave differently than they typically do.
11. I understand that NIH is proposing to cut the indirect costs rate. If they do so, the consequences for the lifesaving research we conduct at the Laufer Center will be devastating. I believe that the Laufer Center's research could possibly save thousands of lives from the ravages of neurodegenerative diseases.
12. It is not an exaggeration to say that the true cost of the NIH's decision may be that thousands of American lives are needlessly degraded or sacrificed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 9th day of February, 2025, in Stony Brook, New York.

/s/ Ken A. Dill

Ken A. Dill  
SUNY Distinguished Professor of Physics  
and Chemistry; Affiliated Distinguished  
Professor in Applied Math; the Louis and  
Beatrice Laufer Endowed Chair of Physical  
and Quantitative Biology; and founding and  
current Director of the Laufer Center for  
Physical and Quantitative Biology  
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